Objectives:
- To provide an overview of the Export Control sub-processes implemented to ensure the Center's compliance with United States Export Control laws and regulations in accordance with National Aeronautic and Space Administration (NASA) Procedural Requirements (NPR) 2190.1, NASA Export Control Program and NASA Advisory Implementing Instruction (NAII) 2190.1, NASA Export Control Program Operations Manual.
- To support NASA KSC activities by providing Export Control classifications of products when created or before issuance, assessments of potential Export Control concerns, and assistance exporting required items to a foreign national or entity.
- To assist employees in navigating the complex system of Export Control activities.

/ original signed by /
Approved: _____
Director, Spaceport Integration and Services

Background: Export Control laws and regulations exist to restrict the use of and access to controlled **technical information and commodities** for the reasons of national security or protection of trade. Attention to Export Control compliance has increased due to heightened concerns about homeland security, weapons of war, terrorism, and leaks of United States technology to foreign competitors. Almost all commodities/items have some level of export control (e.g. Limitations on sending items to sanctioned countries - very few item exceptions).

Scope:
• NASA performs Export Control functions on items generated by NASA work activities or contractor work activities (if providing direct support to NASA offices).
• Contractors perform Export Control functions on their items that are deliverables as specified in their contract.
• Export Control activities will be coordinated with the NASA Center holding the international agreement for that activity and hosting the particular program/project.

Implementation: The integration of the Export Control function is inherently complex. This document provides:
• A listing of the KSC Export Control Processes (sub-flows) that integrate NAII 2190.1 implementing instructions with NASA KSC processes (see below).
• A Quick Reference Guide to employee activities that require a consideration of export control concerns (Pages 2 and 3).
• A KSC Export Control Integration Map identifying KSC processes that integrate with KSC Export Control Office (ECO) processes (Page 4).

KSC Export Control Processes:
KDP-KSC-P-2190A, Kennedy Space Center (KSC) Export Control Process: Sub-Flow 1 - Obtain an Export Classification/Jurisdiction
KDP-KSC-P-2190B, Kennedy Space Center (KSC) Export Control Process: Sub-Flow 2 - Transfer/Share an Export Controlled Item with a United States Citizen
KDP-KSC-P-2190C, Kennedy Space Center (KSC) Export Control Process: Sub-Flow 3 - Export of an Export Controlled Item to a Foreign National/Entity
KDP-KSC-P-2190D, Kennedy Space Center (KSC) Export Control Process: Sub-Flow 4 - Foreign National Access Control

Definitions:
• **Export:** An export is the transfer of anything to a foreign person or a foreign destination by any means, anywhere, anytime. An export can involve a commodity, software, technical data, technology, providing a defense service, and/or providing technical assistance. Exporting a controlled item to a foreign national/entity versus transferring/sharing a controlled item to a United States citizen/entity are two distinctly different activities (See KDP-KSC-P-2190B and KDP-KSC-P-2190C).
• **Technical data** is defined as information required for the design, development, production, manufacture, assembly, operation, repair, testing, maintenance or modification of defense articles, such as rockets and certain spacecraft (International Traffic in Arms Regulations [ITAR]).
• **Technology** is defined as information necessary for the development, production, use, operation, installation, maintenance, repair, overhaul, or refurbishing of an item on the Commerce Control List (Export Administration Regulations [EAR]). It can be in many forms including verbal communication, drawings, photographs, operation manuals, presentations, and more.
• **Classification/Jurisdiction:** The term "classification" is associated with EAR regulations (EC Classification Number [ECCN]). The term "jurisdiction" is associated with ITAR regulations (eg. CAT IV or CAT XV).

TENETS OF EXPORTING AN ITEM TO A FOREIGN NATIONAL/ENTITY:
• Must have a classification/jurisdiction of the item that will be exported
• Must have a *requirement* to export (an international agreement, contract, procurement, business relationship)
• Must have *authorization* to export (an approval to export based on regulations and provided by the KSC ECO)
• Must keep the export *secure* (such as using encrypted email or secure access)
• Must keep a *record* of the export (usually kept by the export control office having authority for the program/project)

Reminder: Email attachments containing controlled information must be encrypted. If uncertain whether an item has export control concerns, encrypt all email attachments. **For assistance, please contact the KSC ECO.**

RELEASED - Printed documents may be obsolete; validate prior to use.

Quick Reference Guide: Export Control Related Activities

1. More than one of the following may apply to your planned activities.
2. For additional information, see process integration diagram categories on Page 5.

If you are:	For the purpose of:	You should consult:	For the applicability of the following export control activity:
Creating/Giving a Presentation	Speaker's Bureau/Public Outreach	KDP-KSC-P-1114, Speaker's Bureau	Presentations to the public can only contain publicly available or STI approved content. The Speaker's Bureau process details how to ensure content can be shared, including Scientific and Technical Information (STI)/KSC ECO review.
	Conference Participation	KDP-KSC-P-1212, KSC Scientific and Technical Information Review Process NPR 2200.2, Requirements for Documentation, Approval and Dissemination of Scientific and Technical Information STI/STRIVES Web Site	Presentations at conferences can only contain publicly available or STI approved content. KDP-KSC-P-1212 is used to approve content for public release and includes a KSC ECO review.
	Official Business	KDP-KSC-P-2190A	Technical content requires Export Control classification/jurisdiction statements. To share export controlled content with foreign parties, an export authorization is required (See KDP-KSC-P-2190C).
Creating a Technical Document	Official Business	KDP-KSC-P-2190A	If the technical document will (or could) be shared with other parties, a KSC ECO review will provide a classification/jurisdiction of the content so any users will be aware of controlled content.
	Publication or STI Release	KDP-KSC-P-1212 NPR 2200.2 STI/STRIVES Web Site	Publications, technical reports, fundamental research, and other documents for public release or NASA/Contractor access are reviewed by KSC ECO during the STI routing process to ensure suitability for public release or to apply EC markings.
Requesting a badge to Host/Escort/ Interact with a Foreign National	Official Business	NAII 1600.4, Foreign National Access Management Operations Manual KDP-KSC-P-2190D	The Identity and Access Management (IdMAX) "Foreign National" tab fields are reviewed for export control impacts. Provisos and Access Control Plans/Technology Transfer Control Plans are specified by KSC ECO, as necessary.
	Guest Visit		Foreign national guests at the Center that do not have an official Business relationship cannot be provided access to any export controlled items.
Sharing an Item with a U.S. Citizen	Official Business	KDP-KSC-P-2190B	To properly share export controlled Items with U.S. persons: -- For official business only -- Marked with proper Export Control statement and securely transferred
Exporting an Item to a Foreign National	Official Business	NAII 1600.4 KDP-KSC-P-2190C	To properly conduct an export of an item to a foreign national: -- Requires an agreement/business requirement and export authorization -- Requires secure transfer and proper record keeping
Disposing of Property	Excess Property	KDP-KSC-P-3716, Kennedy Space Center Personal Property Transfer/Excess Request	To provide a KSC ECO review of excessed items to determine method of disposal.

Disposing of Property	Excess Property	KDP-KSC-P-3710, Kennedy Space Center Personal Property Transfer/Excess Request	To provide a KSC ECO review of excessed items to determine method of disposal.

If you are:	For the purpose of:	You should consult:	For the applicability of the following export control activity:
Disposing of Documents	Disposal/ Recycle	NAII 2190.1	Ensure export controlled documents are recycled in locked bins
Arranging or Hosting a Tour with Foreign Nationals	Official Business	KNPR 1600.1, KSC Security Procedural Requirements KDP-KSC-P-2190B KDP-KSC-P-2190D	Tours for familiarization that include controlled areas, hardware and operations require consultation with the KSC ECO when foreign nationals are involved to obtain an Export Control authorization for the sharing of any technology and/or to exclude export controlled items that are not within the scope of the business relationship.
	Guest Visit	KDP-KSC-P-1867, Tours for Official Visitors	In accordance with (IAW) KDP-KSC-P-1867, standard tours have been pre-vetted for the exclusion of Export Control concerns. Tours, other than standard tours, that include controlled areas, hardware, and operations require consultation with KSC ECO when foreign nationals are involved to ensure the exclusion of export controlled items.
Taking Imagery	Official Business	KDP-KSC-P-2190A	To provide KSC ECO authorization of imagery for public release. -- See KNPR 1600.1 (Section 10) for photography policy. -- Imagery for public use is coordinated IAW KDP-P-1128, Video/Photograph Support.
	Personal		Personal photos/videos must be in compliance with NASA Photography Policy to ensure no export controlled content. If uncertain, personal photos can be submitted IAW KDP-KSC-P-2190A.
Going on Foreign Travel	Official Business	See "Foreign Travel" guidance on Export Control SharePoint site	Any export controlled information taken on foreign travel must be categorized and authorized by KSC ECO IAW KDP-KSC-P-1485, Foreign Travel Authorization Process.
	Personal		Export controlled information cannot be taken on personal foreign travel without the approval of a supervisor and proper coordination with KSC ECO and with Information Technology and Communications Services (IT) for IT devices. Notify Protective Services if you hold a security clearance.
Planning for a Program/Project	Programs/ Projects at KSC or Cross-Program (with other Centers)	NPR 2190.1	To ensure Export Control activities are planned and coordinated with the lead Center for all Programs/Projects.
Sending an E-mail	Official Business	NAII 2190.1	E-mails containing export controlled content must be sent encrypted.

If you are:	For the purpose of:	You should consult:	For the applicability of the following export control activity:
Requiring Export Control Training	Training Compliance	SATERN KTI-2190	Required Export Control training and its frequency is established and administered in SATERN and designated in KTI-2190.
Sending Correspondence in U.S. Mail	Official Correspondence	See "KSC Mail (USPS)" on Export Control Web Site on KSC Communicator	IAW NAII 2190.1, all foreign correspondence must be reviewed and authorized by KSC ECO. In order to mail, the KSC Post Office requires an authorization number (OM-XXX), which is entered on the bottom left of the front of the envelope
Shipping an Item	Official Business	KDP-P-1788, Custom Support - Exports KNPR 6000.1, KSC Transportation Support System Manual NAII 2190.1	To ensure exports are provided a classification/jurisdiction an export authorization by KSC ECO, if required.

Hardware/ Software Reviews

(SI) KDP-KSC-P-3716 Personal Property Transfer/Excess
(IT) KDP-P-3928 Software Delivery

Events and Imagery

(PX) KDP-P-1122 Special Events Coordination
(PX) KDP-P-1128 Video/Photograph Support
(PX) KDP-P-2590 Feature Approval
(PX) KDP-P-2585 Media Projects
(SI) KNPR 1600.1 KSC Security Procedural Requirements

Reports, Conference Presentations, Speaker's Bureau, Patents, and STI Review (Public Release)

(IT) STI (Site)
(IT) NPR 2200.2 STI Policy
(IT) KDP-KSC-P-1212 STI Process
(PX) KDP-P-1115 Public Information Publications
(PX) KDP-KSC-P-1114 Speaker's Bureau

Technical Document Reviews

(NE) KDP-P-5031 Concept Development
(NE) KDP-P-5032 Preliminary Design
(NE) KDP-P-5033 Final Design
(NE) KDP-KSC-P-2393 Lesson Learned
(NE) KDP-KSC-P-1538 KSC Specifications and Standards Process
(IT) KDP-KSC-P-1212 STI Process
(SA) KDP-KSC-P-2103 GIDEP Initiation and Publication
(LX) GSDO-PLN-1001 GSDO Information and Configuration Management Plan
(FA) CCT-PLN-1000 CCP Information and Configuration Management Plan
(UB) KDP-P-1551 KSC Technology Transfer

Determinations

Tech Sharing

(SI) KDP-KSC-P-2190 KSC Export Control Process (and Sub-processes)
(SI) ECO SharePoint (Site)

Export Control Policies and Procedures

(SI) NPD 2190.1 Export Control Policy
(SI) NPR 2190.1 Export Control Procedural Requirements
(SI) NAII 2190.1 Export Control Program Operations Manual

Sensitive But Unclassified (SBU) Information Management

(IT) NID 1600.55 SBU/CUI
(IT) KSC Privacy, SBU, and CUI Resource Center (Site)

Mail or Shipping

(SI) KNPR 6000.1 KSC Transportation System Manual
(SI) KDP-P-1788 Custom Support - Exports
(SI) KNPD 1460.1 KSC Mail Management Program
(SI) KTI-1203 KSC Mail Management

Foreign National Badging, Access and Escorting

(SI) NAII 1600.4 Foreign National Access Management
(SI) Identity Credential and Access Management (Site)
(SI) IdMAX Foreign National Workbench (Site)
(SI) KNPR 1600.1 KSC Security Procedural Requirements
(SI) Technology Transfer/Access Control Plans (TTCP/ACP) (See NAII 2190.1, Sect.2.6.6, 2.6.7)

Tours

(PX) KDP-KSC-P-1867 Tours for Official Visitors

Foreign Travel

(GG) KDP-KSC-P-1485 Foreign Travel Authorization
(SI) KNPR 1600.1 KSC Security Procedural Requirements
(IT) Memo: Traveling Abroad with NASA IT Assets
(SI) Foreign Travel Briefing

Website Reviews

(IT) Sitecore (Site)
AART (Site) - Agency Application Rationalization Tool

IT Security & IT Devices

(IT) KDP-P-3345 IT Security Incident Response
(IT) Guidance: Traveling Abroad with NASA IT Assets

Procurement

(OP) 48 CFR Part 1825 Foreign Acquisition

Employee Training

(BA) KTI-1576 Mandatory & Required Training
(SI) KSC-PLN-2190 Export Control Training Plan
(UB) KDP-P-1750 Use of Interns for R&T Projects
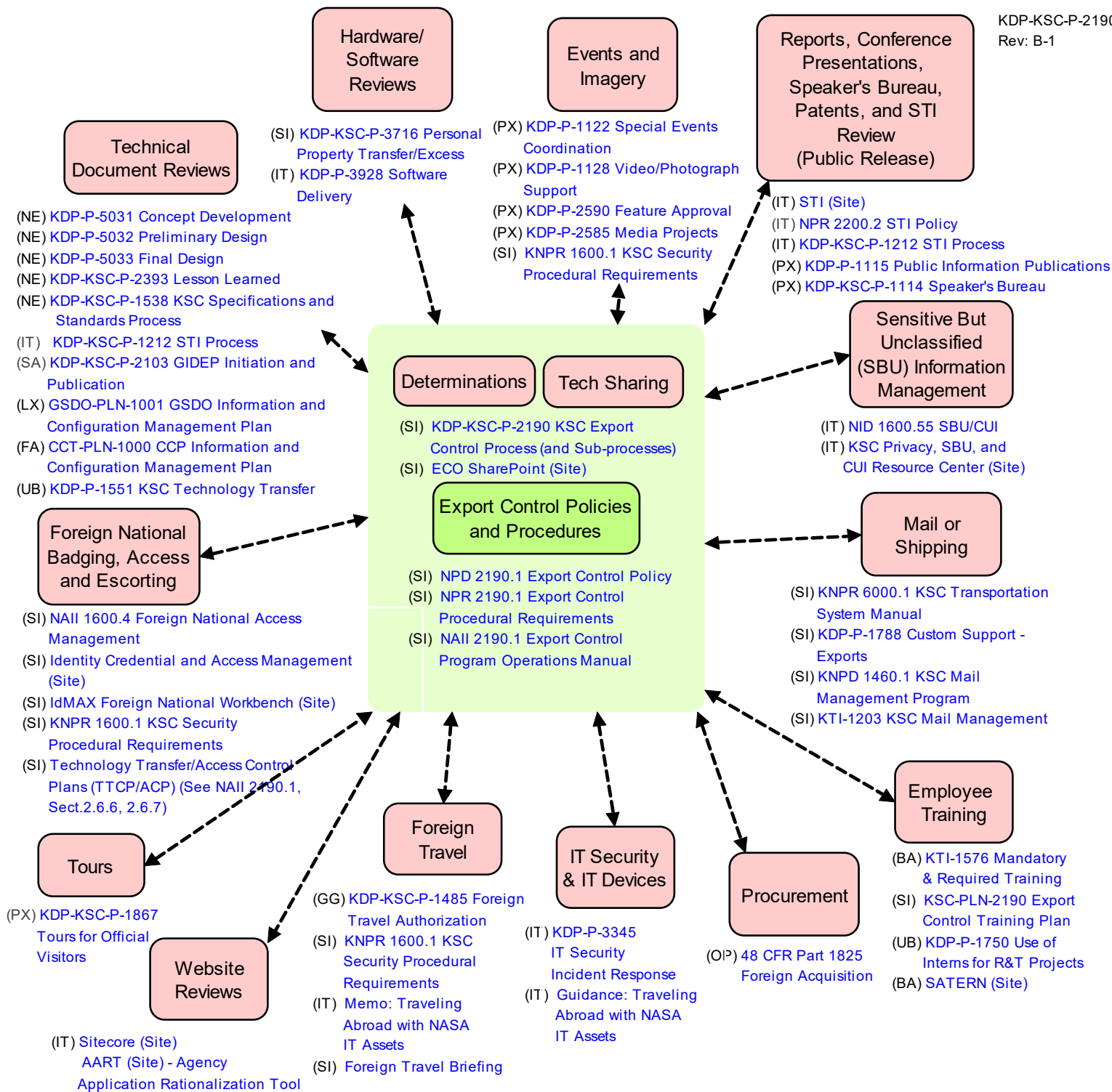(BA) SATERN (Site)

Diagram 1: KSC Export Control Integration Map

- Implementation of KSC's Export Control program is dependent upon numerous processes across various organizations at the Center. Each of the above processes, policy requirements, or IT system applications depicted above includes an export control "role" in the process. The above processes may reference/involve other processes not depicted in Diagram 1.

- The above processes do not necessarily include employee responsibilities to be incorporated as part of their daily routine that are defined in NASA and KSC policies (such as proper SBU recycling in locked bins, sending any controlled information in encrypted e-mails, photography policies, proper use of IT devices, and other activities that are reinforced by the System for Administration, Training, and Educational Resources for NASA [SATERN] training and regular Center informational communications).

- NAII 2190.1 is quite extensive and is the primary procedural document used by the KSC ECO. Consult with the KSC ECO, as necessary.

Requests for reviews include:
- Technical Documents (drawings, program documents, test and operating procedures, reports)
- Pictures/Videos
- Tours
- Shipping/Mail
- Property Disposal
- Records
- Foreign Travel Notifications

Start

Note 3: Requests for reviews include:
- Technical Documents (drawings, program documents, test and operating procedures, reports)
- Pictures/Videos
- Tours
- Property Disposal
- Records
- Software
- Presentations (non-public)
- Foreign Travel Notifications
- Mail/Shipping

Dept. 1

Start